

EPAUnited States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

3-59

☐ Other ☐ Amendment Number:

Contract Number

EP-W-10-002

Contract Period 11/19/2009 To 09/19/2014

Base Option Period Number 3

Title of Work Assignment/SF Site Name

Implement & Monitor Ait Enforc

Contractor:

INDUSTRIAL ECONOMICS, INCORPORATED

Specify Section and paragraph of Contract SOW

Element III, Section 1, para 1, pgs 10-11

Purpose:



Work Assignment



Work Assignment Close-Out



Work Assignment Amendment



Incremental Funding



Work Plan Approval

Period of Performance

from 09/20/2012 To 09/19/2013

Comments:

The purpose of this action is to initiate Work Assignment 3-59. The contractor shall submit a work plan and budget estimate in accordance with the contract.



Superfund

Accounting and Appropriations Data



Non Superfund

SFO
(Max 2)

Note: To report additional accounting and appropriations data use EPA Form 1900-69A.

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period:

11/19/2009 To 09/19/2014

Cost/Fee:

LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated:

Cost/Fee:

LOE:

Cumulative Approved:

Cost/Fee:

LOE:

Work Assignment Manager Name Yvonne Watson

Branch/Mail Code:

Phone Number 202-566-2239

FAX Number:

(Signature)

(Date)

Project Officer Name Cheryl R. Brown

Branch/Mail Code:

Phone Number: 202-566-0940

FAX Number:

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code:

Phone Number:

FAX Number:

(Signature)

(Date)

Contracting Official Name Soeian Mantliyan

Branch/Mail Code:

Phone Number: 202-566-1987

FAX Number:

(Signature)

(Date) 2/28/13

Work Assignment Statement of Work

Title: **Implementation and Monitoring** of the Rigorous Pilot Test of an Alternative Enforcement Targeting Strategy

Contractor: IEC, Inc. **Contract No.:** EP-W-10-002

Work Assignment Number: **WA 3-59**

Estimated Period of Performance: Date of issuance to September 19, 2013

Estimated Level of Effort: **385 Hours**

Key EPA Personnel:

Work Assignment COR (WA COR):

Yvonne M. Watson
OP/OSEM/ESD (MC1807T)
202-566-2239
202-566-2200

Work Assignment Alternate COR

Matt Keene
OP/OSEM/ESD (MC1807T)
202-566-2240
202-566-2200

Contract Level COR: Cheryl R. Brown
CMG/OP (1805T)
202/566-0940
202/566-3001 (fax)

BACKGROUND AND PURPOSE:

Located within the Office of Policy (OP)'s Office of Strategic Environmental Management is the Evaluation Support Division (ESD). ESD's mission is to build the capacity of EPA staff and managers to conduct program evaluation activities throughout the Agency by providing technical support and training on program evaluation for EPA's national programs and regional offices. A crucial component in assessing the benefit of meeting goals, objectives, and sub-objectives is having measurable results.

As part of its effort to encourage the effective use of program evaluations throughout the Agency, ESD promotes program evaluation through a Program Evaluation Competition (PEC or Competition). This Competition is part of an ongoing, long-term effort to help build the capacity of headquarters and regional offices to evaluate activities and to improve measures of program performance. This program evaluation project was chosen for support under the Program Evaluation Competition sponsored by OP.

Region 4's Office of Environmental Accountability (OEA) is interested in determining whether it can achieve its enforcement and compliance goals in a more cost effective manner by improving and innovating the targeting phase of the enforcement process. Region 4 staff believes that an alternative enforcement targeting strategy might improve the compliance rates of Federal facilities. To this end, Region 4 plans to pilot an alternative enforcement targeting strategy in 2013, and will compare the Region's traditional enforcement targeting approach to the alternative targeting approach. This multi-year effort will involve several stages including: design, implementation, evaluation, adaptation and dissemination of learning. The work included in this work assignment supports the implementation of the pilot project.

As part of a Memorandum of Agreement (MOA), EPA is partnering with Dr. Paul Ferraro of Georgia State University's Center for Evidence Based Environmental Policy and Programs to design the evaluation methodology. Dr. Ferraro has extensive expertise and knowledge in applying experimental designs to environmental programs and will assume the role of principal investigator for this effort. The contractor shall work collaboratively with EPA and Dr. Ferraro.

Quality Assurance (QA) Requirements

Check ☒ Yes or ☐ NO, if the following statement is true or false. The Contractor shall submit a short written Quality Assurance Project Plan for any project that is developing environmental measurements or a Quality Assurance Supplement to the Quality Management Plan for any project which generates environmental data using models with their technical proposal.

TASKS AND DELIVERABLES:

The work assignment (WA) Contracting Officer Representative (COR) will review all deliverables in draft form and provide revisions and/or comments to the contractor. The contractor shall prepare the final deliverables incorporating the WA COR's comments.

Contractor personnel shall at all times identify themselves as Contractor employees and shall not present themselves as EPA employees. Furthermore, they shall not represent the views of the U.S. Government, EPA, or its employees. In addition, the Contractor shall not engage in inherently governmental activities, including but not limited to actual determination of EPA policy and preparation of documents on EPA letterhead.

TASK 1: PREPARE WORKPLAN

The contractor shall prepare a workplan that addresses the tasks in this statement of work within 15 calendar days of receipt of a work assignment signed by the Contracting Officer (CO). The workplan shall outline, describe and include the technical approach, resources, timeline and due dates for deliverables, a detailed cost estimate by task and a staffing plan. The WA COR and the Contract Level COR and the CO will review the workplan. However, only the CO can approve/disapprove the workplan. The contractor shall prepare a revised workplan incorporating the Contracting Officer's comments, if required.

Deliverables and Schedule Under Task 1

- | | |
|----------------------|-------------------------------------------------------------------------|
| 1a. Workplan | Within 15 calendar days of receipt of work assignment. |
| 1b. Revised workplan | Within 5 calendar days of receipt of comments from the CO, if required. |

NOTE REGARDING WORK ASSIGNMENT DELIVERABLES AND TECHNICAL DIRECTION:

The Work Assignment Contracting Officer's Representative (COR) is authorized to issue technical direction (TD) under this work assignment. The COR will follow-up all oral technical direction in writing within 5 days.

NOTE: Staff requirements for this work assignment include first-hand experience designing evaluation methodologies to establish program impact. Expert knowledge of and experience in considering probability sampling, random selection and random assignment are essential to successful performance under this work assignment.

TASK 2: IMPLEMENTATION

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]

EPA plans to implement Phase 1 of the Region 4 Enforcement Targeting pilot project in Fall 2013. The contractor shall work with EPA's Evaluation Team to develop products and tools to implement the pilot project.

- 2-1 PARTICIPATE IN CONFERENCE CALLS. The contractor shall participate in conference calls with the WA COR, other Agency staff and the principal investigator to implement the evaluation methodology and pilot project. The COR will contact the contractor and provide a time and date for the conference calls. The contractor shall develop a brief meeting summary documenting the key discussion, decisions, actions items and next steps. The contractor shall deliver the summary 3 days after the meeting/conference call.

Assumptions:

For purposes of costing, the contractor shall assume that meetings will occur weekly for the first four months of the implementation phase. Thereafter, meetings will occur biweekly.

- 2-2 DEVELOP PROJECT IMPLEMENTATION TOOLS. The contractor shall assist EPA with developing project tools /instruments that are necessary components for implementing the pilot project and evaluation design. These include but are not limited to an: 1) inspection check list; and 2) an information request letter described below. Additional tools may be needed for pilot implementation. The EPA COR shall provide the details for these additional tools via TD.

Comprehensive Check List. During the implementation phase of the project, enforcement inspectors will visit federal facilities to measure pilot project outcomes. An inspection check list will help standardize inspector observations, reduce measurement error and variance among inspectors who are conducting on-site inspections of federal facilities. With input provided by the WA COR and the Evaluation Team, the contractor shall design a draft inspection checklist that will have elements of the major and minor potential violations for facilities subject to applicable Resource Conservation and Recovery Act and Clean Air Act statutes. The WA COR shall specify the elements of the inspection check list in project meetings (Task 2-1) and via Technical Directive (TD). EPA expects the check list will be between 3- 6 pages in length. The WA COR will provide comments on the draft inspection check list via TD. The contractor shall incorporate the WA COR's comments and finalize the check list. The WA COR will specify the deliverable dates for the draft and final check list via TD. However, for planning purposes, the contractor may anticipate delivering the draft check list within two weeks after receipt of the TD. The final checklist may be required one week after receipt of comments from the EPA COR.

Information Request Letter. EPA uses Information Request Letters to obtain information from the regulated community related to their compliance status. With input provided by the EPA COR and the Evaluation Team, the contractor shall develop a draft Information Request Letter for use in the pilot project. The draft letter shall contain language regarding two innovative features: a) an Affirmation Policy and b) Norm-based messaging regarding compliance. The WA COR shall specify the content of the letter during project meetings and via Technical Directive (TD). The WA COR will provide comments on the draft letter via TD. The contractor shall incorporate the WA COR's comments and finalize the check list. The WA COR will specify the deliverable dates for the draft and final letter via TD. However, for planning purposes, the contractor may anticipate delivering the draft information request letter list one week after receipt of the TD. The final checklist may be required one week after receipt of comments from the EPA COR.

Assumptions:

For purposes of costing, the contractor shall assume: EPA will need between 2-5 additional tools.

2-3 IMPLEMENTATION OF THE EVALUATION METHODOLOGY DESIGN. EPA requires contractor assistance to implement the evaluation methodology for the pilot project. The evaluation methodology is being developed as part of a separate but related effort. The contractor shall work closely with the WA COR, the Evaluation Team and the Region 4 Implementation Team to implement the evaluation methodology. To this end, the contractor shall be available to discuss and implement (as appropriate) the primary and secondary data sources, collection methods, appropriate qualitative and quantitative tools for analyzing data, practical issues of data collection, any survey instruments, survey data, survey questions, and interview/ discussion guides and protocols used in support of the evaluation as developed as part of the methodology. Implementation issues

will be discussed in project meetings (Task 2-1). Specific implementation tasks shall be specified via TD. However, for planning purposes, the contractor may anticipate implementing the evaluation methodology upon receipt of the TD from the EPA COR. The collection of data will occur among federal facilities subject to EPA's enforcement strategy. Therefore, the Paper Work Reduction Act and Information Collection Request requirements do not apply.

Deliverables and Schedule Under Task 2

2-1	Participate in conference calls	To be specified by the WA COR
2-1a	Meeting Summary	3 days after the meeting/conference call
2-2a	Draft Implementation Tools	As specified by the WA COR via TD
2-2b	Final Implementation Tools	After receipt of EPA comments and as specified by the WA COR via TD.
2-3	Implement Methodology	As specified by the WA COR via TD

TASK 3: MONITORING

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]

3-1 MONITORING PLAN. The contractor shall develop a draft monitoring plan designed to periodically assess project implementation, track progress, collect data and assess data quality. The monitoring plan shall include analytic procedures, and any plans for interim analyses, a protocol and data management procedures for data capture, cleaning, summarization, and quality assurance. The plan shall specify the responsibilities of the individuals who will collect data. In addition, it shall include a schedule that specifies the frequency and timing of reviews and any monitoring protocols. The plan shall include a protocol for documenting and addressing any deviation from the agreed upon protocol. The WA COR will specify the elements of the monitoring plan during project meetings and via TD. The WA COR will provide comments on the draft monitoring plan via TD. The contractor shall incorporate the WA COR's comments and finalize the monitoring plan. The WA COR will specify the deliverable dates for the draft and final monitoring plan via TD. However, for planning purposes, the contractor may anticipate delivering the monitoring plan within three weeks after receipt of the TD. The final monitoring plan may be required one week after receipt of comments from the EPA COR.

Table 1: Summary of Deliverables and Dates

Task	Deliverable	Due Date
Task 1 Prepare Work plan		
1a	Work plan	Within 15 calendar days of receipt of work assignment
1b	Revised work plan	Within 5 calendar days of receipt of comments from CO
Task 2 Implementation		
2-1	Participate in conference calls	To be specified by the WA COR via TD
2-1a	Meeting Summary	3 calendar days after the meeting/conference call
2-2a	Draft Implementation Tools	As specified by the COR via TD
2-2b	Final Implementation Tools	As specified by the COR via TD
2-3	Methodology Implementation	As specified by the COR via TD
Task 3 Data Collection and Monitoring		
3-1a	Draft Monitoring Plan	As specified by the COR via TD
3-1b	Final Monitoring Plan	As specified by the COR via TD

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Washington, DC 20460**Work Assignment**

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EP-W-10-002

Contract Period 11/19/2009 To 09/19/2014

Base

Option Period Number 3

Title of Work Assignment/SF Site Name

Implement & Monitor Alt Enforc

Contractor

INDUSTRIAL ECONOMICS, INCORPORATED

Specify Section and paragraph of Contract: SOW

Element III, Section 1, para 1, pgs 10-11

Purpose:



Work Assignment



Work Assignment Close-Out



Work Assignment Amendment



Incremental Funding



Work Plan Approval

Period of Performance

From 09/20/2012 To 09/19/2013

Comments:

The purpose of this action under Work Assignment 3-59 is to approve the contractor's work plan and budget estimate dated March 12, 2013 for a level of effort of 385 hours, estimated cost of (b)(4) fixed fee of (b)(4) for a total of \$47,880.75.



Superfund

Accounting and Appropriations Data



Non-Superfund

SFO
(Max 2)

Note: To report additional accounting and appropriations data use EPA Form 1900-69A

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	\$/hr/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period:

11/19/2009 To 09/19/2014

Cost/Fee: \$0.00

LOC: 0

This Action:

\$47,880.75

385

Total:

\$47,880.75

385

Work Plan / Cost Estimate Approvals

Contractor WP Dated: 03/12/2013

Cost/Fee: \$47,880.75

LOC: 385

Cumulative Approved

Cost/Fee: \$47,880.75

LOC: 385

Work Assignment Manager Name Yvonne Watson

Branch/Mail Code:

Phone Number: 202-566-2239

FAX Number:

(Signature)

(Date)

Project Officer Name Cheryl R. Brown

Branch/Mail Code:

Phone Number: 202-566-0940

FAX Number:

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code:

Phone Number:

FAX Number:

(Signature)

(Date)

Contracting Official Name Stefan Merriyan

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Phone Number: 202-564-1987

FAX Number:

(Signature)

(Date) 4/3/13